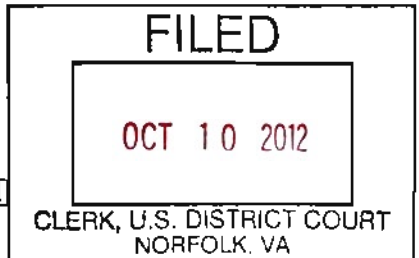


AFFIDAVIT IN SUPPORT OF APPLICATION
FOR ISSUANCE OF A CRIMINAL COMPLAINT



I, Kristin B. Joseph, being first duly sworn state:

1. I am employed as a Special Agent (SA) with the Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), currently assigned to the Office of the Assistant Special Agent in Charge in Norfolk, VA (ASAC/Norfolk). I have been so employed since August 2005. As part of my daily duties as an ICE agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256(8))¹ in all forms of media including computer media.

2. Your affiant has assisted in the investigation of the offenses described in this affidavit. As a result of your affiant's participation in this investigation and a review of reports made by other law enforcement officers, your affiant is familiar with the circumstances of this on-going investigation. I have not included each and every fact known to me in this affidavit, but only the facts I believe are necessary to establish probable cause to believe CHRISTOPHER WARD committed violations of 18 U.S.C. § 2251(a).

3. IMGSRG is a Russian image board where users can create accounts and post images for other users to see. Some images are contained within folders that are password protected, and an individual who wishes to view the folder has to contact the user who posted the images to request the password. Often the password protected folders contain images depicting the sexual exploitation of minors. Other images that do not need a password typically depict clothed children in non-sexually explicit conduct. However, the comments made by the users who view the images indicate their interest in the sexual exploitation of children. Users can comment on each other's pictures and discuss trading via e-mail accounts to trade additional images.

4. On August 31, 2012, HSI C3/VIP received a child exploitation referral for the specific IMGSRG user name "sexylittlegirl1". Sexylittlegirl1 had posted pictures and comments on IMGSRG indicating that the user engaged in contact abuse of a minor and

¹ "Child Pornography means any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; ... [or] (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct." For conduct occurring after April 30, 2003, the definition also includes "(B) such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in sexually explicit conduct." 18 U.S.C. § 2256(8).

the production and distribution of child exploitation materials. On October 4, 2012, HSI C3/VIP forwarded the lead to the HSI Norfolk, VA office to continue the investigation.

5. A review of the IMGSRG account "sexylittlegirl1" revealed it was created on March 16, 2012. Data provided by IMGSRG via Russian law enforcement indicates that the email address associated with the account is Chris.ward2003@gmail.com. Sexylittlegirl1's profile is visible to anyone who accesses the website. The user has posted three picture albums, however two of the albums are password protected. The passwords were obtained from IMGSRG via Russian law enforcement. The three albums and their contents are described as:

a. The first album is entitled "my oldest daughter nude" and is password protected. The album was last modified on April 12, 2012. The album was categorized as "nudity" and contains eight images. The images are of a prepubescent female who appears to be approximately 6-9 years old. One of the images depicts the female lifting her shirt exposing her undeveloped chest to the camera. Five images depict the female naked from the waist down either standing or lying on her back exposing her genitalia to the camera. One image depicts the female naked from the waist down standing with her back to the camera and an adult hand is lifting up her shirt exposing her buttocks to the camera. And one image depicts the female completely naked standing in a doorway. The password for the album is "Sexy1".

b. The second album is entitled "My family" and is not password protected. The album was last modified on April 12, 2012. The album was not categorized, and contains twelve images. Some of the images within this album depict the same prepubescent juvenile female depicted in the album entitled "my oldest daughter nude". In some images she is even wearing the same t-shirt as she did in the other images. There is an adult female, an infant, and other unidentified female children depicted in this album, although none of them are nude. Other users commented on the pictures and posted requests asking for the password to exchange images.

c. The third album is entitled "Girls I know" and is password protected. The album was last modified on May 14, 2012. The album was categorized as "nudity" and contains thirteen images. The images are of fully developed females who appear to be teenagers or adults, some nude or topless.

6. Further investigation and responses from issued subpoenas to email, ISP, and telephone providers indicated the creator of the IMGSRG account "sexlittlegirls1" to be CHRISTOPHER WARD. Drive by surveillance conducted by HIS S/A's revealed the residence located at 608 North Shore Road, Norfolk, VA, 23505, was in fact the location of the "clean" pictures discovered in the "My Family" folder of the IMGSRG account. In addition agents were able to establish the girl in the photographs from the folder "my oldest daughter nude" was in fact the 11 year old step daughter (herein referred to as Jane Doe) of CHRISTOPHER WARD.

7. On October 9, 2012, HSI Agents and a representative from the Norfolk Child Protective Services (CPS) interviewed Jane Doe. During the interview CPS interviewers presented the nude images of Jane Doe to her in which she stated the images were taken by both her Mom and Dad at her house. Jane Doe also indicated that her Mom and Dad took the pictures because her "vagina was hurting" and they needed pictures to show the doctor. The CPS representative stated that based on her training and experience, she felt as if Jane Doe's answers were scripted, like someone told her what to say if she was asked about the pictures.

8. Shortly after the interview with Jane Doe at her school, her mother, WARD's fiancé, arrived. HSI S/A's approached Jane Doe's mother and informed her of the nature of the investigation and statements that had been made against her. Jane Doe's mother immediately denied ever taking any inappropriate pictures of her daughter and broke down crying. During the interview with Jane Doe's mother, she told the agents they could go to her house and take anything they wanted. Subsequently the agents, Jane Doe's mother, and CPS agents traveled to the residence at 608 North Shore Road, Norfolk, VA, 23505. Upon arrival it was discovered that WARD had already arrived home.

9. HSI S/A's Wolpert and Ruocco made contact with WARD, identified themselves and asked to speak to WARD. WARD granted consent to the agents to enter the residence. HSI S/A's informed WARD that at that moment other agents were applying for a search warrant to search his residence, he did not have to answer questions and wasn't under arrest. WARD stated he understood and "was just wondering what was going on". HSI S/A's stated they needed to speak to him regarding Internet use and asked what he thought may bring the agents to his residence. WARD stated he thought it may have been over an email he had recently sent to someone for something he shouldn't have off a website named IMGSRG. WARD stated the email had to do with children doing things they shouldn't.

10. Once that statement was made by WARD, S/A Wolpert excused himself and went outside. S/A Wolpert learned that a search warrant had been granted to search the residence. S/A Wolpert then went back into the residence and asked WARD if he would be okay continuing the interview in S/A Wolpert's vehicle for privacy and so his fiancé and handicapped daughter could come inside as they had been waiting in a vehicle outside. WARD agreed to continue the interview in the vehicle.

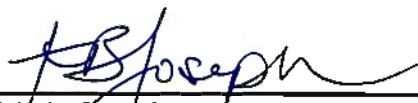
11. Once WARD and the agents were in the vehicle, S/A Wolpert administered WARD his Miranda Warnings in which WARD waived them and agreed to speak with the agents after signing the form indicating his waiver. During the interview with WARD, WARD continuously denied taking any inappropriate photos of Jane Doe, creating a personal IMGSRG account, and posting photos to an IMGSRG account. It wasn't until being presented with evidence to the contrary that WARD admitted to his actions regarding the IMGSRG account and his posting of inappropriate pictures of Jane Doe to it. WARD also steadily admitted to taking the inappropriate photos of Jane Doe

that were of a sexually explicit nature after denying it.

12. WARD stated that the photos were taken as a joke and that Jane Doe had walked in front of him and "flashed" him. WARD initially stated he only took pictures of her belly, then admitted to taking pictures of her butt when she mooned him. WARD initially denied taking any other photos of her other body parts. Agents informed him they had other pictures of Jane Doe of her other body parts. WARD feigned surprise and then also admitted to taking photos of Jane Doe's "hoo ha" when she posed for those as well. WARD stated Jane Doe would flash him. WARD had no answer when agents told him the photos were posed and not from a little girl "flashing" him. Another photo was of Jane Doe naked standing outside a bathroom. WARD stated Jane Doe was taking a shower and forgot her towel. Again WARD had no answer when asked why he would happen to be standing inside the bathroom with his camera pointing out at just that moment. WARD admitted to taking the photographs of JANE DOE with his Verizon cell phone.

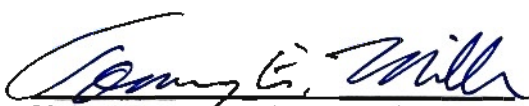
13. Finally, after placing WARD under arrest and transporting him to the Norfolk City Jail, Jane Doe returned home and spoke with her mother about the activities with WARD. During the conversation Jane Doe also indicated that WARD had at different times inserted his fingers and penis into her vagina. Those allegations are currently being investigated.

14. Based on the information and evidence set forth above, your affiant respectfully submits that there is probable cause to believe that CHRISTOPHER WARD has committed the offense of unlawfully and knowingly employing, using, persuading, inducing, enticing, and coercing any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, said visual depiction having been transported and transmitted in interstate and foreign commerce by any means in violation of Title 18 United States Code, Sections 2251(a).



Kristin Joseph
Special Agent
Department of Homeland Security
Homeland Security Investigations
Norfolk, VA

Sworn to before me this 10th day of October 2012.



United States Magistrate Judge
Eastern District of Virginia